

1 DANIEL J. HILL, ESQ.  
NV Bar # 12773  
2 WOLF, RIFKIN, SHAPIRO,  
SCHULMAN & RABKIN LLP  
3 3556 East Russell Road, 2nd Floor  
4 Las Vegas, Nevada 89120  
Tel: (702) 341-5200  
5 Fax: (702) 341-5300  
DHill@wrslawyers.com  
6 *Attorney for Defendant Ammon E. Bundy*

7  
8  
9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 AMMON E. BUNDY, *et al.*,

15 Defendants.

**CASE NO.: 2:16-CR-00046-GMN-PAL**

**DEFENDANT AMMON E. BUNDY'S  
MOTION FOR TWO DAY EXTENSION  
TO FILE MEMORANDUM REGARDING  
COMPLEXITY AND MEMORANDUM**

**Complex Case Hearing:  
April 22, 2016 at 10:00 a.m.**

17  
18 This is defendant Ammon E. Bundy's ("Ammon") MOTION FOR TWO DAY EXTENSION  
19 TO FILE MEMORANDUM REGARDING COMPLEXITY. Ammon's memorandum regarding  
20 complexity is attached as **Exhibit A**.

21 On March 25, 2016, this Court entered an Order (Doc. 198) setting a hearing to determine this  
22 case's complexity for April 22, 2016. On that same date, this Court also ordered the defendants, in the  
23 event they could not agree with the government on a case setting, to file points and authorities in  
24 support of their position by April 18, 2016. *See* Order, Doc. 198. Undersigned counsel was appointed  
25 on this case on April 15, 2016, three days before that filing deadline. *See* Order Appointing Counsel,  
26 Doc. 260. Undersigned counsel has spent the last three days familiarizing himself with the voluminous  
27 docket in this matter and preparing for Ammon's detention hearing, currently scheduled for the same  
28 date as the date of this motion.



**CERTIFICATE OF SERVICE**

I hereby certify that on this 20<sup>th</sup> day of April 2016, a true and correct copy of **DEFENDANT AMMON E. BUNDY'S MOTION FOR TWO DAY EXTENSION TO FILE MEMORANDUM REGARDING COMPLEXITY AND MEMORANDUM** was served via the United States District Court CM/ECF system on all parties or persons requiring notice.

By /s/ Jennifer Finley

Jennifer Finley, an Employee of  
WOLF, RIFKIN, SHAPIRO, SCHULMAN &  
RABKIN, LLP